

Debtor 1 Chad R. Wolfe

Debtor 2 Erik J. Kolodziej  
(Spouse, if filing)

United States Bankruptcy Court for the: WESTERN District of Pennsylvania  
(State)

Case number 16-21367-GLT

## Form 4100R

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

**Name of creditor:** PENNYMAC LOAN SERVICES LLC **Court claim no. (if known):** 19

**Last 4 digits** of any number you use to identify the debtor's account: 2255 \_\_\_\_\_

**Property address:** 3011 Grey Fox Circle  
Number Street

Bridgeville, Pennsylvania 15017  
City State ZIP Code

**Part 2: Prepetition Default Payments**

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 4 / 1 / 2022  
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ 0.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM / DD / YYYY

Debtor 1 Chad R. Wolfe Case number (if known) 16-21367-GLT  
First Name Middle Name Last Name

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/ Andrew M. Lubin Date 03/22/2022  
Signature

Print Andrew M. Lubin Title Attorney for creditor  
First Name Middle Name Last Name

Company McCabe, Weisberg & Conway, LLC

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 123 S. Broad Street, Suite 1400  
Number Street  
Philadelphia, PA 19109  
City State ZIP Code

Contact phone (215) 790 - 1010 Email ecfmail@mwc-law.com

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: Chad R. Wolfe and Erik J. Kolodziej  
Debtors

PENNYMAC LOAN SERVICES LLC, or its  
Successor or Assignee  
Movant

vs.

Ronda J. Winnecour  
Chad R. Wolfe and Erik J. Kolodziej  
Respondents

Chapter 13

Bankruptcy No. 16-21367-GLT

Related to Document Nos.

**CERTIFICATION OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE  
PAYMENT**

I, Andrew M. Lubin, attorney for PENNYMAC LOAN SERVICES LLC, hereby certify that I served a true and correct copy of the foregoing Response to Notice of Final Cure Payment, by United States Mail, first class, postage prepaid, and/or electronic means, upon the following:  
Date Served: March 22, 2022

Chad R. Wolfe  
3011 Grey Fox Circle  
Bridgeville, Pennsylvania  
15017

Erik J. Kolodziej  
3011 Grey Fox Circle  
Bridgeville, Pennsylvania  
15017

Shawn N. Wright, Esquire  
7240 McKnight Road  
Pittsburgh, Pennsylvania  
15237  
Attorney for Debtors

Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, Pennsylvania  
15219  
Trustee

U.S. Trustee  
Office of the United States  
Trustee  
Liberty Center.  
1001 Liberty Avenue, Suite  
970  
Pittsburgh, PA 15222

/s/ Andrew M. Lubin

MARGARET GAIRO, ESQUIRE ID # 34419  
MARISA MYERS COHEN, ESQUIRE ID #87830  
JOSEPH I. FOLEY, ESQUIRE ID # 314675  
CHELSEA NIXON, ESQUIRE ID # 324130  
ANDREW M. LUBIN, ESQUIRE ID # 54297  
Attorney for PENNYMAC LOAN SERVICES LLC

123 South Broad Street, Suite 1400  
Philadelphia, PA 19109  
Telephone: (215) 790-1010  
Facsimile: (215) 790-1274  
Email: [ecfmail@mwc-law.com](mailto:ecfmail@mwc-law.com)